

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

JASON TILLERY and JERRY LANIER )

*Plaintiffs,* )

v. )

Case No.: 3:23-cv-00203

CORECIVIC, INC., CORECIVIC OF )

TENNESSEE, LLC; CORRECTIONAL )

MEDICAL ASSOCIATES, INC.; )

DAMON T. HININGER; )

PATRICK SWINDLE; JASON MEDLIN; )

VINCE VANTELL; HILTON HALL, JR.; )

JERRY WARDLOW; JOSHUA CARTER; )

JOSHUA MORTON; KEITH IVENS; )

T. ROBINSON; and ELAINA RODELA )

*Defendants.* )

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**DEFENDANTS' MOTION TO SEVER CLAIMS**

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Defendants, CoreCivic of Tennessee, LLC, CoreCivic, Inc., Correctional Medical Associates, Inc., Damon T. Hininger, Joshua Carter, Keith Ivens, Jason Medlin, Elaina Rodela, M.D., Patrick Swindle, Jerry Wardlow and Vince Vantell (hereinafter, "Defendants"), by and through undersigned counsel and without waiving any and all defenses to the Complaint, respectfully move this Court to sever the claims brought by Plaintiffs Jason Tillery and Jerry Lanier into two (2) separate lawsuits pursuant to Rule 21 of the FEDERAL RULES OF CIVIL PROCEDURE. In support thereof, Defendants rely upon their "Memorandum of Law in Support of Motion to Sever Claims," and upon the entire record of this cause.

Respectfully submitted,

PENTECOST, GLENN & TILLY, PLLC

By: s/Nathan D. Tilly  
Nathan D. Tilly (#31318)  
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CoreCivic of Tennessee, LLC, Correctional  
Medical Associates, Inc., Damon T. Hininger,  
Joshua Carter, Keith Ivens, Jason Medlin,  
Elaina Rodela, M.D., Patrick Swindle, Jerry  
Wardlow and Vince Vantell*  
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**CERTIFICATE OF CONSULTATION**

The undersigned consulted with Plaintiffs' counsel concerning the request sought by this motion. Plaintiffs' counsel confirmed that Plaintiffs oppose this motion.

s/Nathan D. Tilly

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was served via US District Court ECF system and/or U.S. Mail postage prepaid upon:

Ty Clevenger  
*Attorney for Plaintiffs*  
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Brooklyn, NY 11201  
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on or before the filing date thereof.

DATE: This the 21<sup>st</sup> day of July, 2023.

By: s/Nathan D. Tilly  
Nathan D. Tilly